

## **REMARKS**

Applicants respectfully request reconsideration of the present application in view of the foregoing amendments and in view of the reasons that follow.

In the specification, paragraphs have been amended on page 2.

Applicant respectfully submits that the disclosure of Applicant's application provides support for the amendments to the claims. For example, at least page 2, line 23, and page 9, lines 1-12, of Applicant's specification provides support for the amendments to the claims.

This amendment adds, changes and/or deletes claims in this application. A detailed listing of all claims that are, or were, in the application, irrespective of whether the claim(s) remain under examination in the application, is presented, with an appropriate defined status identifier.

After amending the claims as set forth above, claims 1-17 are now pending in this application.

### **Priority**

Applicant acknowledges that some of the boxes to acknowledge Applicant's claim for foreign priority and receipt of certified copies of the priority documents have been marked on the Office Action Summary. However, a box to acknowledge that all certified copies have been received has not been marked. Applicant respectfully requests that the Office acknowledge Applicant's claim for foreign priority and receipt of certified copies of the priority documents in the next Office correspondence, such as by marking all boxes in the Priority section of the summary of the Office correspondence.

### **Information Disclosure Statements**

Applicant acknowledges receipt of signed and initialed copies of the PTO/SB/08 forms provided with the Information Disclosure Statements of September 1, 2006 and January 10, 2007. Applicant notes that an Information Disclosure Statement and PTO/SB/08 form were also submitted on July 14, 2009. Applicant respectfully requests that the Office

provide a signed and initialed copy of this PTO/SB/08 form with the next Office correspondence.

**Rejections under 35 U.S.C. § 112**

Claim 1 is rejected under 35 U.S.C. § 112, first paragraph, as allegedly failing to comply with the enablement requirement. Claim 1 is rejected under 35 U.S.C. § 112, second paragraph, as allegedly being indefinite. These rejections are respectfully traversed.

The Office states on page 2 of the Office Action that the disclosure of Applicant's application is not enabling for claim 1 because it is unclear what the projections are, it is unclear which part of the combustion trajectory is claimed, and it is unclear which vector is recited in claim 1. The Office states on page 3 of the Office Action that the language "said vectors" in claim 1 lacked antecedent basis.

Applicant respectfully submits that the amendments to the claims overcome these issues and render these rejections moot. Reconsideration and withdrawal of these rejections is respectfully requested.

**Rejection under 35 U.S.C. § 102**

Claims 1-2, 4-7, and 15-17 are rejected under 35 U.S.C. § 102(b) as allegedly being anticipated by U.S. Patent No. 6,088,930 to Robin *et al.* (hereafter "Robin"). This rejection is respectfully traversed.

A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. *Verdegaal Bros. v. Union Oil Co. of California*, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). See MPEP § 2131.

Robin discloses a heat treatment installation for heat treating a strip 1 that includes blower elements 2 separated from each other by at least one infrared radiant element 3, with each blower having a suction element 4. See Robin at col. 2, lines 53-60. Each blower element 2 has near the strip two air blower slots 8 transverse to the direction D of the strip 1 and a suction nozzle 9 that forms an acute dihedron with an adjacent end wall 10 of the blower element 2. See Robin at col. 3, lines 6-32.

However, Robin does not disclose a drier installation for drying a web comprising, among other things, radiant elements and at least a transversal convective system equipped with suction and blowing devices configured to suck at least part of combustion products produced by said radiant elements by a suction duct and configured to blow said part of the combustion products towards said web by a blowing duct, wherein said suction and blowing ducts stretch out in the transverse direction of said web, said convective system comprising at least a mixing device installed opposite of the web in relation to corresponding suction and blowing ducts, wherein the mixing device is arranged so as to suck and/or blow said least part of combustion products, said sucked and/or blown at least part of the combustion products comprising different jets, wherein respective trajectories of the different jets are represented by vectors, wherein a vector average of projections of the vectors in a plane perpendicular to said web and stretching out in the transverse direction of said web has a component parallel to the web that is smaller than said maximum web width of said web, as recited in claim 1. Claims 2, 4-7, and 15-17 depend from claim 1.

The Office argues on pages 3-4 of the Office Action that Robin discloses a mixing device arranged to suck and/or blow at least part of combustion products produced by radiant elements 3, with the part of the combustion products comprising different jets, wherein respective trajectories of the different jets are represented by vectors, wherein a vector average of projections of the vectors in a plane perpendicular to said web and stretching out in the transverse direction of said web has a component parallel to the web that is smaller than said maximum web width of said web, as recited in claim 1.

However, Robin is silent in regard to respective trajectories for jets of combustion product of the radiant elements 3 and any vectors representing the trajectories of such jets, as recited in claim 1. There is no indication in Robin, including the drawings of Robin, of any trajectories for jets of combustion products of the radiant elements 3 or vectors that represent such trajectories. Furthermore, there is no indication or disclosure in Robin of any vector average of vectors in a plane perpendicular to a web and stretching out in a transverse direction of the web has a component parallel to the web that is smaller than a maximum web width of the web, as recited in claim 1.

The Office refers to the drawings and col. 3, lines 6-15, 30-32, of Robin but the drawings of Robin provide no indication of any trajectories or vectors representing trajectories of jets of combustion products. Instead, the passage in col. 3 referred to by the Office discloses that the suction nozzle 9 of Robin achieves effective suction while preventing disturbance of the radiant elements 3, protecting the blower modules 2 from radiation, and maintaining the efficiency of the blower modules. In other words, the passage referred to by the Office regards the suction and blowing of hot gases, not on the way parts of a suction and blow duct communicate with one another.

### **Rejections under 35 U.S.C. § 103**

Claim 3 is rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Robin. This rejection is respectfully traversed. As discussed above, Robin fails to disclose or suggest all of the features of claim 1, which claim 3 depends from. Therefore, Robin does not render claim 3 to be unpatentable. Reconsideration and withdrawal of this rejection is respectfully requested.

Claims 8-11 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Robin in view of U.S. Patent No. 5,416,979 to Joiner (hereafter “Joiner”). This rejection is respectfully traversed. Joiner fails to remedy the deficiencies of Robin discussed above in regard to independent claim 1, from which claims 8-11 depend. Reconsideration and withdrawal of this rejection is respectfully requested.

Claims 12-14 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Robin in view of U.S. Patent No. 4,146,361 to Cirrito (hereafter “Cirrito”). This rejection is respectfully traversed. Cirrito fails to remedy the deficiencies of Robin discussed above in regard to independent claim 1, from which claims 12-14 depend. Reconsideration and withdrawal of this rejection is respectfully requested.

### **Double Patenting Rejection**

Claims 1-17 are provisionally rejected on the ground of nonstatutory obviousness-type double patenting as being unpatentable over claims 1-20 of copending U.S. application No.

10/591,393. Because this is a provisional rejection regarding a copending application, Applicant respectfully requests that this rejection be held in abeyance.

**Conclusion**

Applicant submit that the present application is now in condition for allowance. Favorable reconsideration of the application as amended is respectfully requested.

The Examiner is invited to contact the undersigned by telephone if it is felt that a telephone interview would advance the prosecution of the present application.

The Commissioner is hereby authorized to charge any additional fees which may be required regarding this application under 37 C.F.R. §§ 1.16-1.17, or credit any overpayment, to Deposit Account No. 19-0741. Should no proper payment be enclosed herewith, as by a check being in the wrong amount, unsigned, post-dated, otherwise improper or informal or even entirely missing or a credit card payment form being unsigned, providing incorrect information resulting in a rejected credit card transaction, or even entirely missing, the Commissioner is authorized to charge the unpaid amount to Deposit Account No. 19-0741. If any extensions of time are needed for timely acceptance of papers submitted herewith, Applicants hereby petition for such extension under 37 C.F.R. §1.136 and authorizes payment of any such extensions fees to Deposit Account No. 19-0741.

Respectfully submitted,

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